

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

NOV 14 2003

**MATRIX ENERGY, LLC            )  
FOR DETERMINATION OF        )  
RETAIL ELECTRIC SUPPLIER    )**

**CASE NO. 2003-00228**

**DOCUMENT REQUEST OF BIG SANDY RURAL ELECTRIC  
COOPERATIVE CORPORATION**

Big Sandy Rural Electric Cooperative Corporation ("Big Sandy") for its Document Request to "Kentucky Power states as follows:

**Definitions**

A. "Document" means every writing of every type and description in the possession, custody or control of the Petitioner, or in the possession, custody or control of any agent of the Petitioner, and shall include (without limitation) the following, whether printed, reported, filmed or reproduced by any process, or written or produced by hand, and whether an original, master or copy; letters, correspondence, communications, messages, notes, memoranda, contracts, agreements, litigation agreements, settlements, judgment, checks, canceled checks, receipts, affidavits, depositions statements, including any account statement by any bank book, records, books of account, reports, applications, summaries, minutes and record of telephone conversation, meetings and conferences( including lists of persons attending meetings or conferences),lists worksheets, financial statements, expense reports and records, summaries and records of personal conversations or interviews, manuals, publication, diaries, charts, logs, cablegram, telegrams, mailgram, income statement, balance sheet, transcription, voice recordings and transcriptions thereof plans, sketches, drawings, photographs, reports and/or summaries

investigations and/or surveys opinions and reports of consultants, opinions of counsel, reports and summaries of negotiations, brochures, pamphlets, proposals design, catalogs, catalog sheets, specifications, advertisements, circulars, invoices, work orders, purchase orders, studies and calculations, and the originals thereof or, if the original of any document is not available or is not in respondent's possession, custody or control, all copies of the original of such and all document and all copies of any document which is not identical to the original thereof or which contains any writing or notations which do not appear on the original thereof.

B. "Relating" means in any way directly relating, referring, describing, concerning, considering, constituting, containing, underlying, proposing, explaining, memorializing, confirming, modifying, amending, evidencing, certifying, representing, supporting, opposing, qualifying, terminating, revoking, canceling, negating, affirming, regarding, alluding, endorsing, or applying to, the designated subject, or relevant to the designated subject within the meaning of Rule 26.02(1) of the Kentucky Rules of Civil Procedure.

C. These requests are continuing in character, so as to require supplementary answers if you obtain further or different information before trial. Where the name or identify of persons is requested, please state the full name, home address and also business address and telephone number, if known. Unless otherwise indicated, these requests refer to the time and place and circumstance of the occurrences mentioned or complained of in the pleading. Where documents or information in the possession of a party is request, such request includes documents or information of the party's agent, representative, or unless privileged, their Attorney.

1. With reference to the "Testimony of Delinda Borden", please produce a copy of all written documents which relate to the testimony regarding temporary service to matrix Mine opening.
2. With reference to the "Testimony of Delinda Borden", please produce a copy of all written documents which relate to the discussion on October 11, 2002 with Mr. Horn regarding a new service for Matrix Energy.
3. With reference to the "Testimony of Delinda Borden", please produce a copy of all written documents which relate to rate calculations provided to Matrix.

Respectfully Submitted,



Albert A. Burchett

P.O. Box 0346

Prestonsburg, KY 41653

Attorney for Big Sandy

Rural Electric Cooperative  
Corporation

Phone: (606) 974-9701

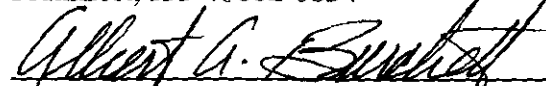
Fax: (606) 874-8010

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Document Request was served by First Class Mail, postage prepaid, on November 13, 2003 upon:

Robert C. Moore  
HAZELRIGG & COX, LLP  
415 West Main Street, 1<sup>st</sup> Floor  
P.O. Box 676  
Frankfort, KY 40602-0676

Mark R. Overstreet, Esq.  
STITES & HARBISON, PLLC  
421 West Main Street  
P.O. Box 634  
Frankfort, KY 40602-0634



Attorney for "Big Sandy"